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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10 FRESNO DIVISION

11 YELLOWCAKE, INC., a California
corporation and LATIN POWER MUSIC
12 USA, LLC, a California limited liability
company,

13 Plaintiffs,

14 v.

15 UMG RECORDINGS, INC., UNIVERSAL
16 MUSIC LATIN ENTERTAINMENT, DISA
LATIN MUSIC, UNIVERSAL MUSIC
17 PUBLISHING GROUP, CORPORATIVO
LATIN POWER MUSIC SA DE CV and
18 JOSE SERRANO MONTOYA,

19 Defendants.
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CASE NO. 1:22-cv-01109-JAM-CSK

**STIPULATION AND ORDER TO
CONTINUE THE HEARING ON
PLAINTIFFS' MOTION FOR LEAVE TO
FILE A SECOND AMENDED
COMPLAINT AND MODIFY THE
SCHEDULING ORDER**

Hon. John A. Mendez

Filed: 08/31/2022

Trial Date: 05/12/2025

TO THE HONORABLE COURT:

Plaintiffs Yellowcake , Inc. and Latin Power Music USA, LLC (“Plaintiffs”) on the one hand, and Defendants UMG Recordings Inc. and its divisions Universal Music Latin Entertainment and Disa Latin Music (together, “UMG”) on the other hand (collectively, the “Parties”), by and through their respective attorneys, hereby agree and stipulate as follows with reference to the following facts:

1. On October 8, 2024, Plaintiffs filed their Motion for Leave to File a Second Amended Complaint and Modify the Scheduling Order. ECF 47 (the “Motion”). Plaintiffs noticed the Motion to be heard on November 12, 2024, at 1:00pm before the Honorable John A. Mendez.

2. UMG intends to oppose the Motion. Presently, the Opposition is due on or before Tuesday, October 22, 2024.

3. Simultaneously, the Parties are continuing to discuss potential resolution of Plaintiffs’ claims, which, if successful, may moot the Motion.

4. In the interest of judicial economy, and to allow the Parties the opportunity to focus on resolution, the Parties have agreed, subject to Court approval, to adjourn the hearing date of the Motion until **December 10, 2024** at 1:00 p.m.

5. To accommodate the Parties’ schedules and certain preexisting commitments, the Parties have further stipulated and agreed to the following briefing schedule regarding the Motion:

- Opposition to be filed on or before **November 19, 2024;**
- Reply briefs to be filed on or before **November 26, 2024;**

6. All Parties reserve all rights in connection with the briefing and opposition of the Motion.

NOW THEREFORE, the Parties hereby agree and stipulate as follows:

1. The Hearing on Plaintiffs’ Motion for Leave to File a Second Amended Complaint and Modify the Scheduling Order shall be adjourned to **December 10, 2024 at 1:00 p.m.;**

2. The Opposition to the Motion shall be filed on or before **November 19, 2024;**

3. The Reply brief in support of the Motion shall be filed on or before **November 26, 2024**.

The Parties jointly request that the Court approve this Stipulation and enter an order hereon, adjourning the hearing date and modifying the briefing schedule as set forth above.

DATED: October 20, 2024

Respectfully submitted,

Seth L. Berman
ABRAMS FENSTERMAN, LLP

By: /s/ Seth L. Berman
Seth L. Berman
Attorney for Plaintiffs
Yellowcake, Inc. and Latin Power Music USA,
LLC

David A. Steinberg
MITCHELL SILBERBERG & KNUPP, LLP

By: /s/ David A. Steinberg
David A. Steinberg
Attorney for Defendants
UMG Recordings, Inc., Universal Music Latin
Entertainment, and Disa Latin Music

ORDER

Pursuant to the Stipulation Regarding Plaintiffs' Motion for Leave to File a Second Amended Complaint and Modify the Scheduling Order ("Stipulation"), and good cause appearing, the Court **APPROVES** the Stipulation, **CONTINUES** the hearing, and **MODIFIES** the briefing schedule on Plaintiffs' Motion for Leave to File a Second Amended Complaint and Modify the Scheduling Order (ECF No. 47) as follows:

- Any opposition shall be filed by **November 19, 2024**;
- Any reply brief shall be filed by **November 26, 2024**; and
- The hearing on Plaintiffs' motion (ECF No. 47), is **RESET** for **December 10, 2024, at 01:00 p.m.**, in person, in Courtroom 6, on the 14th floor of the Robert T. Matsui Federal Courthouse, in Sacramento, California, before Senior District Judge John A. Mendez.

IT IS SO ORDERED.

Dated: October 21, 2024

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE